

1 MAYER BROWN LLP
JOHN NADOLENCO (SBN 181128)
2 jnadolenco@mayerbrown.com
STEVEN E. RICH (SBN 198412)
3 srich@mayerbrown.com
350 South Grand Avenue
4 25th Floor
Los Angeles, CA 90071-1503
5 Telephone: (213) 229-9500
Facsimile: (213) 625-0248
6

MAYER BROWN LLP
7 LUCIA NALE
lnale@mayerbrown.com
8 DEBRA BOGO-ERNST
dernst@mayerbrown.com
9 71 South Wacker Drive
Chicago, IL 60606
10 Telephone: (312) 782-0600
Facsimile: (312) 701-7711
11 *(Pro Hac Vice Applications To Be Filed)*

12 Attorneys for Defendants
CITIMORTGAGE, INC.; CITIBANK,
13 N.A., AND CITIGROUP, INC.

14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **OAKLAND DIVISION**
17

18 MARIA BETANCOURT and PEDRO
BETANCOURT, individually and on
19 behalf of all others similarly situated,

20 Plaintiffs,

21 v.

22 CITIMORTGAGE, INC., a New York
corporation; CITIBANK, N.A., a
23 national banking association;
CITIGROUP, INC., a Delaware
24 corporation; and Does 1-100,

25 Defendants.
26
27
28

Case No. CV10-03168-SBA

**DEFENDANTS'
CERTIFICATION OF
INTERESTED ENTITIES OR
PERSONS (CIVIL L.R. 3-16)**

Pursuant to Civil L.R. 3-16, the undersigned, counsel for Defendants CitiMortgage, Inc., Citibank, N.A., and Citigroup, Inc., certifies that the following listed persons, associations of persons, firms, partnerships, corporations (including parent corporations) or other entities (i) have a financial interest in the subject matter in controversy or in a party to the proceeding, or (ii) have a non-financial interest in that subject matter or in party that could be substantially affected by the outcome of this proceeding:

1. The parent company of CitiMortgage, Inc. is Citibank Domestic Investment Corp. Citibank Domestic Investment Corp. owns 100% of the stock of CitiMortgage, Inc.

2. The parent company of Citibank Domestic Investment Corp. is Citibank, N.A. Citibank, N.A. owns 100% of the stock of Citibank Domestic Investment Corp.

3. The parent company of Citibank, N.A. is Citicorp Holdings, Inc. Citicorp Holdings, Inc. owns 100% of the stock of Citibank, N.A.

4. The Parent company of Citicorp Holdings, Inc. is Citigroup Inc. Citigroup Inc. owns 100% of the stock of Citicorp Holdings, Inc.

5. The United States owns more than 10% of Citigroup Inc.'s stock.

Dated: September 10, 2010

MAYER BROWN LLP

By: s/ John Nadolenco

John Nadolenco
Steven E. Rich
Attorneys for Defendants
CITIMORTGAGE, INC., CITIBANK,
N.A., AND CITIGROUP, INC.

CERTIFICATE OF SERVICE

I am employed in Los Angeles County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 350 South Grand Avenue, 25th Floor, Los Angeles, California 90071-1503. On September 10, 2010, the following documents were served electronically via the CM/ECF system:

• DEFENDANTS' CERTIFICATION OF INTERESTED ENTITIES OR PERSONS (CIVIL L.R. 3-16)

The parties who received electronic notice of the filing of the foregoing documents included:

- **Elizabeth Scott Letcher**
eletcher@heraca.com
- **Noah Zinner**
nzinner@heraca.com
- **James C. Sturdevant**
jsturdevant@sturdevantlaw.com
- **Whitney Huston**
whuston@sturdevantlaw.com

On September 10, 2010, I served the document listed above by placing true and correct copies thereof in sealed envelopes with postage thereon fully prepaid, in the United States mail at Los Angeles, California addressed as set forth below:

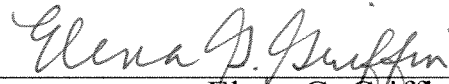
- Maeve Elise Brown
Cynthia Singerman
Housing Economic Rights Advocates
1814 Franklin Street, Suite 1040
Oakland, CA 94612
Telephone: (510) 271-8443
Facsimile: (510) 868-4521
melisebrown@heraca.org
csingerman@heraca.org

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice the envelopes would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in

1 the ordinary course of business. I am aware that on motion of the party served,
2 service is presumed invalid if postal cancellation date or postage meter date is
3 more than one day after date of deposit for mailing in affidavit.

4 I declare under penalty of perjury under the laws of the State of California
5 that the above is true and correct.

6 Executed on September 10, 2010, at Los Angeles, California.

7 
8 _____
9 Elena G. Griffin
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28